



**COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT  
DEPARTMENT OF LABOR  
DIVISION OF OCCUPATIONAL SAFETY**

## **LEAD-SAFE RENOVATION CONTRACTOR INFORMATIONAL BULLETIN**

The following guidance applies to requirements for renovation repair and painting work that disturbs painted surfaces in target housing<sup>1</sup> and child-occupied facilities<sup>2</sup>. A Lead Safe Renovator Contractor may perform repair, renovation or painting work on your home or facility which may include “low risk” or “moderate risk” deleading<sup>3</sup>. The Lead Safe Renovator Contractor license is different from a general contractor’s license. Following is guidance for safely renovating your home or child occupied facility.

### **What activities does the Renovation, Repair or Painting work entail?**

If the renovation, repair or painting work disturbs more than six square feet of painted surface per room on the interiors or more than twenty square feet of painted surface (total) on the exteriors of target housing and child-occupied facilities or any carpentry work, remodeling work, drywall work, electrical work, plumbing work, floor refinishing work, and many other commonly performed renovation, repair, painting and maintenance-related operations, or any window replacement work or demolition work conducted in target housing and child-occupied facilities, regardless of the areas of painted surfaces disturbed by those operations, the work must be performed by either a licensed Lead Safe Renovator Contractor, or, in certain instances, by an entity which has obtained a “Contractor Licensing Waiver,” as described in the paragraph below.

### **Which Contractor Should you Hire to Perform Renovation, Repair or Painting Work in Your Home or Facility?**

Except as allowed for contractors who were previously certified by EPA as “Certified Firms” prior to July 9, 2010 (described below), contractors who carry out RRP work in Massachusetts must be licensed as Lead-Safe Renovation Contractors pursuant to 454 CMR 22.04. This is not the same as a Construction Supervisor’s license issued by the Department of Public Safety or a Home Improvement Contractor registration (HIC) issued by the Office of Consumer Affairs. A list of [licensed Lead-Safe Renovation Contractors](#) may be accessed by clicking on the link on the DOS website at [www.mass.gov/dos](http://www.mass.gov/dos).

---

<sup>1</sup> **Target Housing.** Any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless a child under the age of six resides, or is expected to reside in such housing) and any zero-bedroom dwelling.

<sup>2</sup> **Child-Occupied Facility.** A building or portion of a building, constructed prior to 1978, and visited by the same child of less than six years of age on at least two different days within any week (Sunday through Saturday), provided that each day’s visit lasts at least three hours and the combined weekly visits last at least six hours, and the combined annual visits last at least sixty hours.

<sup>3</sup> “Low Risk Deleading” work is work which exclusively consists of the following abatement activities as set forth in 105 CMR 460.175(A): removing doors, cabinets, windows on hinges and shutters, covering surfaces with encapsulants, capping baseboards and removing cabinet doors and shelves which are not glued, nailed or otherwise affixed to supports. “Moderate Risk Deleading” work is work that has been inspected by a licensed lead inspector pursuant to 454 CMR 22.12(2)(a), excludes work conducted by demolition, and consisting of one or more of the following activities: the removal and replacement of window components, interior stair components, hand rails, door components, fences, bulkheads, lattices, individual shingles or clapboards from the exterior building sides. Moderate Risk Deleading work also includes the repair or making intact of up to two feet of non-intact lead painted surface per room on interiors and up to ten square feet on building exteriors.

Contractors who obtained certification as “Certified Firms” from EPA prior to July 9, 2010 and, pursuant to [454 CMR 22.03\(4\) and 22.04\(3\)](#), have obtained a “Contractor Licensing Waiver” may carry out RRP work in Massachusetts without being licensed as Lead-Safe Renovation Contractors.

Entities that carry out RRP work at their own property using their own employees need not be licensed as Lead-Safe Renovation Contractors, provided that they have obtained a “Contractor Licensing Waiver” pursuant to [454 CMR 22.03\(4\) and 22.04\(3\)](#).

The DOS keeps records of the citation history and license status of Lead-Safe Renovation Contractors. To check on the violation history or licensing status of a Lead-Safe Renovation Contractor, you may call DOS at 617-626-6960.

### **What Kinds of Training Documentation/Certification Should the Supervisor At An RRP Worksite Be Able to Produce?**

The supervisor at an RRP worksite, who is called a “Lead-Safe Renovator-Supervisor” or a “Certified Renovator” is not required to be directly licensed by DOS or EPA. Instead, the supervisor should be able to produce a training certificate (with his or her photograph on the certificate) that was previously issued by an approved RRP training provider within the previous five years. A list of [approved RRP training providers](#) may be accessed by clicking the link on the DOS website at [www.mass.gov/dos/lead](http://www.mass.gov/dos/lead). Possession of a valid training certificate constitutes proper certification by DOS and EPA.

Workers at an RRP worksite are not required to receive formal training in RRP practices from an approved training provider. Instead, workers are required to receive on-the-job training at the worksite from the “Lead-Safe Renovator-Supervisor” or “Certified Renovator”.

### **How Do I Prepare for Renovation, Repair or Painting Work?**

You are responsible for packing all your belongings and moving them away from the work area to avoid contamination. Pay special attention to kitchen items, personal items (toothbrushes e.g.), clothing, curtains and children’s toys. Packing these items in heavy plastic and moving them to another area, such as another room, the attic or basement should work well.

### **What Are the Contractor’s Responsibilities?**

No more than sixty days prior to commencing an RRP activity, the contractor is required to provide the owner of the structure and any tenants a copy of the EPA pamphlet *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools*, to obtain written acknowledgement from the owner and tenants of having received the pamphlet and, while the renovation is ongoing, post informational signs describing the general nature and locations of the renovation and the anticipated completion date.

The Lead-Safe Renovator-Supervisor (Certified Renovator) is required to test each painted surface that would be disturbed by the renovation activity with an approved test kit or assume that all such surfaces contain lead. Alternatively, the surfaces that would be disturbed can be tested by a lead paint inspector or risk assessor licensed by [CLPPP](#) in accordance with using protocols set forth in 105 CMR 460.000 and related policy documents.

The contractor is required to comply with the work practices required by 454 CMR 22.11. These include, but are not limited to: covering with plastic sheeting and sealing with duct tape all items that remain in the work area, covering the ground of exterior work areas with plastic sheeting or tarps, covering the floors of interior work areas with plastic sheeting, closing and sealing doors and windows inside of and adjacent to the work area, covering duct openings with plastic sheeting, using non-prohibited work methods and conducting a thorough clean-up of the work area.

At the conclusion of the work, the Lead-Safe Renovator-Supervisor (Certified Renovator) is required to conduct a visual inspection of the work area to ensure that is cleaned of all paint dust, paint chips or other visible debris. The work area must be repeatedly cleaned until this criterion is met. For interior projects, a cleaning verification procedure or optional dust wipe clearance procedure must be satisfactorily completed before the work area barriers are taken down and reoccupancy of the work area is allowed. The procedure for the cleaning verification step, which the Lead-Safe Renovator-Supervisor (Certified Renovator) is authorized to perform is set forth in Appendix 2 of the DOS lead regulation [454 CMR 22.00](#) and in [40 CFR 745.85](#).

Where dust wipe clearance of RRP projects is performed, it shall be carried out by a lead paint inspector or risk assessor licensed by [CLPPP](#) pursuant to 105 CMR 460.400 and in accordance with procedures and clearance criteria set forth in 105 CMR 460.170 and related policies.

**THIS BULLETIN IS ISSUED AS A GUIDANCE DOCUMENT ONLY AND IS NOT INTENDED TO PROVIDE LEGAL ADVICE. QUESTIONS ABOUT THE DELEADING AND RRP LICENSING LAWS SHOULD BE DIRECTED TO DOS AT (617) 626- 6960 or (617) 969-7177.**